

Item 1 Cover Page



515 Marin Street, Suite 418
Thousand Oaks, CA 91360

www.LongevityCapitalMgmt.com

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This brochure provides information about the qualifications and business practices of Longevity Capital Management LLC. If you have any questions about the contents of this brochure, please contact us at (805) 917-6771. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority. Registration as a registered investment advisor does not imply a certain level of skill or training.

Additional information about Longevity Capital Management LLC also is available on the SEC's website at www.adviserinfo.sec.gov.

Item 2 Material Changes

This is a new brochure and there has not been a previous annual update. Therefore, there are no changes to report.

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Brochure

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Item 4 Advisory Business

Longevity Capital Management LLC (“Longevity Capital Management” or “Advisor”) is an investment advisor firm with a registration pending with the U.S. Securities and Exchange Commission (SEC). Longevity Capital Management and its personnel are fiduciaries by law, owing each client a duty of care and loyalty, and are always required to place the interests of clients first.

The principal owner of Longevity Capital Management is Terri McGray, President.

Private Client Investment Management Services

Longevity Capital Management’s principal service is providing fee-based Investment Management Services and Comprehensive Financial Planning Services to its Private Clients. Clients who commit \$1 million to an account managed by the Advisor are eligible to be included in the Total Advisory Services structure, which includes Investment Management Services and Comprehensive Financial Planning based on a single account management fee. Otherwise, clients may receive separate, standalone Financial Planning Services but will be charged separate fees for the Investment Management and Financial Planning Services. The Advisor practices custom management of portfolios, on a discretionary basis, according to the client’s objectives. The Advisor’s primary approach is to use a tactical allocation strategy aimed at reducing risk and increasing performance. The Advisor may use any of the following: exchange listed securities, over-the-counter securities, corporate debt securities, structured notes, CDs, life insurance, fixed annuities, municipal securities, mutual funds, United States government securities, options in securities, and interests in partnerships investing in real estate to accomplish this objective. The Advisor will not purchase any life insurance or fixed annuity products on a discretionary basis and will discuss any such recommendations with the client in advance. The Advisor measures and selects mutual funds by using various criteria, such as the fund manager’s tenure, and/or overall career performance. The Advisor will, on occasion, redistribute investment allocations to diversify the portfolio in an effort to reduce risk and increase performance. The Advisor may acquire specific stocks to increase sector weighting and/or dividend potential. The Advisor may employ cash positions as a possible hedge against market movement which may adversely affect the portfolio. The Advisor may sell positions for reasons that include, but are not limited to, harvesting capital gains or losses, business or sector risk exposure to a specific security or class of securities, overvaluation or overweighting of the position(s) in the portfolio, change in risk tolerance of client, or any risk deemed unacceptable for the client’s risk tolerance.

Financial Planning Services

For any clients in need of Financial Planning Services and who are not eligible for the Advisor’s Total Advisory Services structure, Longevity Capital Management provides standalone Financial Planning Services. Financial Planning Services may include recommendations for portfolio customization based on the client’s investment objectives, goals and financial situation, recommendations relating to investment strategies as well as tailored investment advice. Financial Planning Services may also include non-investment advice such as developing strategies to achieve retirement or other financial goals, tax optimization strategies, cash flow and budgeting analysis and recommendations, financing and financial education, estate planning, and asset protection strategies. Clients need not engage the Advisor for Investment Management Services,

and depending on the size of the client's portfolio of assets and complexity of needs a standalone comprehensive financial plan may be appropriate. The Advisor's fee for a standalone comprehensive financial plan will vary but is based primarily on the overall value of the client's assets.

Plan Sponsor Qualified Retirement Plan Consulting Services

Longevity Capital Management provides fee-based Qualified Retirement Plan Consulting Services to institutions and other business entities (Plan Sponsors). Longevity Capital Management will evaluate the existing qualified retirement plan solution(s) and will, at a minimum, evaluate the qualified retirement plan's fiduciary compliance program, recordkeeping and third party administration services, investment policy statement and management process, employee communication and education program, and retiree/rollover transitional consulting services. Based on the evaluation, Longevity Capital Management will make objective recommendations to the Plan Sponsor. Upon approval, Longevity Capital Management will implement, manage, and monitor the recommendations with the authorization of the Plan Sponsor. Depending on the extent of investment management authority granted to it by the Plan Sponsor, Longevity Capital Management may acknowledge it is a fiduciary within the meaning of section 3(21) or section 3(38) of ERISA. As part of the process, Longevity Capital Management will provide an investment policy statement. Longevity Capital Management will recommend, monitor, and benchmark the selected investment platform according to the investment policy statement. When we provide investment advice to the Plan Sponsor regarding the Plan account, we are fiduciaries within the meaning of Title I of the Employee Retirement Income Security Act (ERISA) and/or within Section 4975 of the Internal Revenue Code, as applicable, which are laws governing retirement accounts.

As a fiduciary, Longevity Capital Management must always place the client's interest ahead of its own. As such, Longevity Capital Management must:

- Meet a professional standard of care when making investment recommendations (give prudent advice);
- Never put its financial interests ahead of the client's when making recommendations (give loyal advice);
- Avoid misleading statements about conflicts of interest, fees, and investments;
- Follow policies and procedures designed to ensure that the firm gives advice that is in the client's best interest;
- Charge no more than is reasonable for its services;
- Give the client basic information about conflicts of interest.

Longevity Capital Management may recommend and refer Plan Sponsors to unaffiliated money managers or investment advisors ("Investment Manager"). Through this arrangement, the Plan Sponsor will then enter into an advisory agreement with the Investment Manager authorizing them to assist and advise the Plan Sponsor in establishing investment objectives and develop an investment strategy to meet those objectives by identifying appropriate investments and monitoring such investments. Longevity Capital Management may assist the Plan Sponsor in completing the Investment Manager's client questionnaire and opening account paperwork. Longevity Capital Management will also assist in the development of the initial policy recommendations. The Investment Manager is hired by the Plan Sponsor. Longevity Capital

Management is only making recommendations about who should be hired. The Investment Manager will have discretion as to the model portfolios/asset allocations not the individual participants' elections, or asset allocation of any participants should they elect to customize their own portfolio. The Plan Sponsor, prior to entering into an agreement with an Investment Manager recommended by Longevity Capital Management, will be provided with that Investment Manager's Disclosure Brochure. In addition, Longevity Capital Management and the Plan Sponsor will agree in writing that the plan will be managed by that selected Investment Manager on a discretionary basis.

Investment Consulting Services

Longevity Capital Management may provide non-discretionary, hourly fee-based Investment Consulting Services on a project basis to investors with unmanaged investment portfolios. The Advisor will analyze the client's existing financial portfolio, or subset thereof, with the objective of making appropriate recommendations, or suggestions for the client to consider further, that are consistent with the client's objectives, risk tolerance, situation and constraints, as well as consideration of the historic performance of the client's portfolio. The information the Advisor will require to provide the investment consulting services will depend on the client's consulting objectives and scope of work to be performed. The accuracy and completeness of the information provided will allow the Advisor to make better recommendations, or rather, suggestions for the client to consider and analyze further. Investment advisor representatives of Longevity Capital Management may also provide general non-securities advice on topics including tax planning, estate planning, business planning, retirement planning, education planning, budgeting, and cash flow.

Longevity Capital Management will tailor its advisory services to its client's individual needs based on meetings and conversations with the client. If clients wish to impose restrictions on investing in certain securities or types of securities, the Advisor will address those restrictions with the client to have a clear understanding of the client's requirements.

As described in Item 5 below, Private Clients receiving Investment Management Services will be charged a "wrap fee," which is a management fee that is inclusive of both the compensation to Longevity Capital Management for advisory services as well as the securities execution fees charged by the executing broker-dealer. Plan Sponsor clients receiving Qualified Retirement Plan Consulting Services will pay a management fee to Longevity Capital Management for the advisory services, and separately pay the custodial and securities execution fees directly to the custodian and executing broker-dealer from the Plan's brokerage account. The specific client circumstances will be defined in the agreement between the client and Longevity Capital Management. Those Private Clients in the inclusive management fee alternative will be provided with a copy of Longevity Capital Management's Wrap Fee Program Brochure.

A wrap fee program is defined as one where a fee is charged to an account that is not based directly on transactions in the account, and includes both the investment advisory services and the costs of executing the transactions in the account. Longevity Capital Management provides its services to all clients in the same way, as described throughout this Brochure, no matter which pricing option

is applied. Since Longevity Capital Management does not engage access to third-party asset managers in the wrap fee arrangement, Longevity Capital Management retains the entire fee charged to the client. Management fees for a wrap fee pricing option are typically slightly higher than management fees where the client pays securities transaction costs separately to compensate for the estimated costs of trading in the account. Longevity Capital Management's fee will never exceed the maximum fees described in Item 5. Longevity Capital Management's Private Client Investment Management Service fees are non-negotiable and will be agreed with the client prior to establishing the account.

As of the approval date of the firm, Longevity Capital Management had no clients and therefore no client assets under management.

Item 5 Fees and Compensation

Private Client Investment Management Service Fees

Pursuant to an investment advisory contract signed by the Private Client, the client will pay Longevity Capital Management an annual management fee, payable monthly in advance, based on the value of portfolio assets of the account managed by the Advisor as of the opening of business on the first business day of each month. New account fees will be prorated from the inception of the account to the end of the first month.

Assets Under Management:	Annual Fee:
Up to \$500,000	1.50 %
\$500,001 – \$749,999	1.35 %
\$750,000 – \$999,999	1.20 %
\$1 million – \$2,999,999	1.00 %
\$3 million – \$5 million	0.80%
Over \$5 million	0.60%

Fees will be calculated on a breakpoint schedule and are non-negotiable. Accounts with a value of less than \$500,000 will be charged a minimum annual advisory fee of \$5,000. Investment management fees will be directly deducted from the client account on a monthly basis by the qualified custodian. The client will give written authorization permitting the Advisor to be paid directly from their account held by the custodian. The custodian will send a statement at least quarterly to the client.

Financial Planning Service Fees

If elected separately, Clients will contract to have standalone Financial Planning Services provided based on an hourly or fixed fee arrangement. The Advisor's hourly fee will be billed at a rate of \$350 per hour. The Advisor's hourly fee rate is non-negotiable. Hourly fee-based clients are billed one half of the fee at the time of signing the Agreement with the Advisor and the other one half upon delivery of the financial plan or written report to the client. If the final fee is not paid by the client at the delivery of the financial plan or written report, the client is required to pay the fee within five days of delivery of the financial plan or written report. The fee will be based upon the anticipated number of hours it will take to complete the financial plan or project, and in general will range from one to 40 hours (\$350 to \$14,000).

Clients in need of standalone comprehensive financial planning services will be charged a fixed fee. Longevity Capital Management's fixed fee for standalone comprehensive financial planning varies but is based primarily on the overall value of the client's assets:

Value of Client Assets:	Fixed Fee:
Under \$3 million	\$1,500 - \$3,000
\$3 million – \$7 million	\$2,500 - \$5,000
Over \$7 million	\$4,000 - \$15,000

If the client terminates the Agreement with the Advisor prior to the Advisor's completion of the financial plan or project, any fees due the Advisor will be invoiced to the client and payable within five days of delivery of the invoice. If the Advisor completes the financial plan or project in less time than originally planned, the Advisor will refund to the client a pro-rata share of the fee the client paid. The Advisor will refund the pro-rata fee to the client within five days of delivery of the financial plan or written report.

Plan Sponsor Qualified Retirement Plan Consulting Fees

Plan Sponsor will pay the Advisor, as compensation for its services, a consulting fee at an annual rate of up to 0.75% of assets in the Plan including the value of any outstanding loans from the Plan to Participants. The consulting fee is payable monthly or quarterly, in advance or in arrears, based on the fair market value of assets in the Plan at the start/end of each billing period. The consulting fee in the first month/quarter of the Agreement shall be prorated from the inception date to the end of the month/quarter. The Advisor shall invoice the Plan Sponsor for the consulting fee. The Plan Sponsor may, at its election, submit invoices for this consulting fee to the custodian of the Plan's assets for payment. The Plan Sponsor agrees to payment of these invoices, whether directly from the Plan Sponsor or from the Plan's custodian, promptly, and, under normal circumstances, by the end of the month or quarter in which the invoice is submitted.

Fees are negotiable and the Plan Sponsor and Advisor may agree to a minimum monthly/quarterly fee and/or a maximum monthly/quarterly fee. There will be no pre-payment of fees.

The Plan Sponsor and the Advisor may agree, from time to time, that the Advisor be compensated for additional non-investment related duties outside the normal scope of this Agreement on an hourly basis of \$350 per hour. In such cases, the additional duties and hourly rate of compensation shall be agreed to by both parties, in advance, by execution of a codicil to the Agreement. Invoices and terms of payment, in such cases, will be as expressed in the previous paragraph herein. It is expected that such additional duties and compensation will solely relate to operational and compliance needs of the Plan and not relate to investment recommendations.

Investment Consulting Service Fees

Clients will contract to have Investment Consulting Services provided based on an hourly fee arrangement. The Advisor's hourly fee will be billed at a rate of \$350 per hour and is non-negotiable. Hourly fee-based clients are billed one half of the fee at the time of signing the Agreement with the Advisor and the other one half upon delivery of the financial plan or written report to the client. If the final fee is not paid by the client at the delivery of the financial plan or written report, the client is required to pay the fee within five days of delivery of the financial plan

or written report. The fee will be based upon the anticipated number of hours it will take to complete the services, and in general will range from three to eight hours (\$1,050 to \$2,800), but could be higher depending on the objectives and scope of work to be performed.

For each of the Advisor's services described above, the Client may terminate these services within five business days of the effective date of an Agreement signed with the Advisor without any payment of the Advisor's fee.

For Private Client Investment Management Service clients, the Advisor's management fee will include all costs charged by the executing broker-dealer and they will be paid by the Advisor. This method is typically characterized as a "wrap fee," where the management fee includes the investment advisory services as well as all transaction costs and the client pays only that management fee and no other costs concerning the trading of the account. Generally, clients in wrap fee accounts, with the transaction and custody costs included, will pay a slightly higher management fee than in non-wrap accounts, where those costs are not included in the fee. However, clients in a non-wrap account will pay the management fee solely for advisory services and will also directly pay any transaction costs assessed by the executing broker-dealer, such as commissions and transaction fees. The specific arrangement for each client will be negotiated and defined in the investment advisory contract signed by each client, and no advisory fee will exceed the maximum management fees noted above.

Longevity Capital Management's wrap fee program includes investment advisory services and the brokerage services provided by Charles Schwab & Co., Inc. ("Schwab"), a broker-dealer registered with the U.S. Securities and Exchange Commission and a member of FINRA and SIPC. Longevity Capital Management is independently owned and operated and not affiliated with Schwab. Schwab will act solely as a broker-dealer and not as an investment advisor to Longevity Capital Management's clients. In addition to compensating Longevity Capital Management for advisory services, the wrap fee clients pay allows Longevity Capital Management to pay for brokerage and execution services provided by Schwab. Longevity Capital Management does not charge clients a higher advisory fee based on account trading activity and may pay Schwab transaction costs for certain executed securities transactions in wrap fee accounts. As a result, we may have a financial incentive to limit orders for wrap fee accounts because some transactions will increase our transaction costs. Thus, an incentive exists to trade less frequently in a wrap fee program.

When managing a client's account on a wrap fee basis, Longevity Capital Management receives as compensation for its investment advisory services the balance of the total wrap program fee the client pays after any custodial, trading, and other management costs (including execution and transaction fees) have been deducted. Accordingly, Longevity Capital Management may have a conflict of interest because it has a financial incentive to maximize its compensation by seeking to reduce or minimize the total costs incurred in client accounts subject to the wrap fee.

Longevity Capital Management's wrap fee does not cover all fees and costs. All fees paid to Longevity Capital Management for investment advisory services are separate and distinct from the expenses charged by mutual funds to their shareholders and the product sponsor in the case of

insurance products. These fees and expenses are described in each fund's or insurance product's prospectus. The fees not included in the wrap fee include charges imposed directly by a mutual fund, index fund, or ETF, which shall be disclosed in the fund's prospectus (i.e., fund management fees and other fund expenses); mark-ups and mark-downs; spreads paid to market makers; fees (such as a commission or mark-up) for trades executed away from Schwab at another broker-dealer; wire transfer fees; and other fees and taxes on brokerage accounts and securities transactions.

A wrap fee is not based directly on the number of transactions in the wrap account. Various factors influence the relative cost of Longevity Capital Management's wrap fee program to the client, including the costs of investment advice, custody and brokerage services if the client purchased them separately, the types of assets held in the account, and the frequency, type, and size of trades in the account. Longevity Capital Management's wrap fee program could cost the client more or less than purchasing the Advisor's investment advice and custody/brokerage services separately. A wrap fee program may not be suitable for all accounts, including but not limited to accounts holding primarily, and for any substantial period of time, cash or cash equivalents, fixed income securities or no-transaction-fee mutual funds, or any other type of security that can be traded without commissions or other transaction fees. In order to evaluate whether a wrap fee arrangement is appropriate, clients should compare the agreed-upon wrap fee program with the amounts that would be charged by other advisors, broker-dealers, and custodians, for advisory fees, brokerage and execution costs, and custodial services comparable to those provided under the Advisor's wrap fee program.

Schwab and other custodians have eliminated commissions or transaction fees for online trades of U.S. equities, ETFs, and options (subject to \$0.65 per contract fee). This means that, in most cases, when Longevity Capital Management buys and sells these types of securities, it will not have to pay any commissions to Schwab. Longevity Capital Management encourages clients to review Schwab's pricing to compare the total costs of entering into a wrap fee arrangement versus a non-wrap fee arrangement. If clients choose to enter into a wrap fee arrangement the total cost to invest could exceed the cost of paying for brokerage and advisory services separately. To see what the client would pay for transactions in a non-wrap account, please refer to Schwab's most recent pricing schedules available at [schwab.com/aspricingguide](https://www.schwab.com/aspricingguide).

Plan Sponsor clients will be responsible for all custodial and securities execution fees charged by the custodian and executing broker-dealer. The Advisor's fee is separate and distinct from the custodian and execution fees.

At no time will Longevity Capital Management accept or maintain custody of a client's funds or securities except for authorized fee deduction.

Longevity Capital Management's fees may be payable in advance. Upon termination, any fees paid in advance will be prorated to the date of termination and any unearned fees will be refunded to client.

Where acting in the capacity of an insurance agent, investment advisor representatives of Longevity Capital Management may as broker or agent effect insurance transactions for typical

and customary compensation. This practice presents a conflict of interest by creating an incentive to recommend investment products based on the compensation received, rather than on a client's needs. Clients are not obligated to use investment advisor representatives of Longevity Capital Management to execute such insurance transactions. A client may be able to directly invest in products recommended by the firm, without the services of investment advisor representatives of Longevity Capital Management. In that case, the client would not receive the services provided by Longevity Capital Management, which are designed, among other things, to assist the client in determining which products or services are most appropriate to each client's financial condition and objectives.

Item 6 Performance-Based Fees and Side-by-Side Management

Longevity Capital Management does not charge performance-based fees.

Item 7 Types of Clients

The Advisor will offer its services to individuals, pension and profit sharing plans, trusts, estates, or charitable organizations, corporations, and other business entities.

The Advisor's cumulative minimum account requirement for opening and maintaining an account is \$500,000. However, based on facts and circumstances the Advisor may, at its sole discretion, accept accounts with a lower value. Accounts with a value of less than \$500,000 will incur a minimum annual advisory fee of \$5,000 (see Item 5 Fees and Compensation, above, for the Advisor's investment management fee schedule). However, fees will never exceed 2.0% of the client assets under management. Clients who commit \$1 million to an account managed by the Advisor are eligible to be included in the Total Advisory Services structure, which includes Investment Management Services and Comprehensive Financial Planning based on a single account management fee. Clients who do not commit at least \$1 million to an account managed by the Advisor may receive separate, standalone Financial Planning Services but will be charged separate fees for the Investment Management and Financial Planning Services.

Item 8 Methods of Analysis, Investment Strategies and Risk of Loss

The Advisor may utilize fundamental, technical, or cyclical analysis techniques in formulating investment advice or managing assets for clients.

Fundamental analysis of a business involves analyzing its financial statements and health, its management and competitive advantages, and its competitors and markets. Fundamental analysis is performed on historical and present data but with the goal of making financial forecasts. There are several possible objectives: to conduct a company stock valuation and predict its probable price evolution; to make a projection on its business performance; to evaluate its management and make internal business decisions; and to calculate its credit risk.

Technical analysis is a method of evaluating securities by relying on the assumption that market data, such as charts of price, volume and open interest can help predict future (usually short-term)

market trends. Technical analysis assumes that market psychology influences trading in a way that enables predicting when a stock will rise or fall.

Cyclical analysis of economic cycles is used to determine how these cycles affect the returns of an investment, an asset class or an individual company's profits. Cyclical risks exist because the broad economy has been shown to move in cycles, from periods of peak performance followed by a downturn, then a trough of low activity. Between the peak and trough of a business or other economic cycle, investments may fall in value to reflect the uncertainty surrounding future returns as compared with the recent past.

The investment strategies the Advisor will implement may include long term purchases of securities held at least for one year, short term purchases for securities sold within a year, trading of securities sold within 30 days, short sales, margin transactions, and option writing (including covered options, uncovered options, or spreading strategies).

The methods of analysis and investment strategies followed by the Advisor are utilized across all of the Advisors clients, as applicable. One method of analysis or investment strategy is not more significant than the other as the Advisor is considering the client's portfolio, risk tolerance, time horizon and individual goals.

Investing includes the risk that the value of an investment can be negatively affected by factors specifically related to the investment (e.g., capability of management, competition, new inventions by other companies, lawsuits against the company, labor issues, patent expiration, etc.), or to factors related to investing and the markets in general (e.g., the economy, wars, civil unrest or terrorism around the world, concern about oil prices or unemployment, etc.).

Risks of fundamental analysis may include risks that market actions, natural disasters, government actions, world political events or other events not directly related to the price or valuation of a specific company's fundamental analysis can adversely impact the stock price of a company causing a portfolio containing that security to lose value. Risks may also include that the historical data and projections on which the fundamental analysis is performed may not continue to be relevant to the operations of a company going forward, or that management changes or the business direction of management of the company may not permit the company to continue to produce metrics that are consistent with the prior company data utilized in the fundamental analysis, which may negatively affect the Advisor's estimate of the valuation of the company.

The primary risks in technical analysis are that the factors used to analyze the price, trends and volatility of a security may not be replicated, or the outcomes of such analysis will not be the same as in past periods where similar combinations existed. Because of the reliance on trends, technical analysis can signal buying at market peaks and selling at market troughs.

In cyclical analysis, economic or business cycles may not be predictable and may have many fluctuations between long-term expansions and contractions. Also, the lengths of the economic cycles may be difficult to predict with accuracy. Therefore, the risk of cyclical analysis is the difficulty in predicting economic trends and consequently the changing value of securities that would be affected by these changing trends.

All investments involve some degree of risk. In finance, risk refers to the degree of uncertainty and/or potential financial loss inherent in an investment decision. In general, as investment risks rise, investors seek higher returns to compensate themselves for taking such risks. Clients need to be aware that investing in securities involves risk of loss that clients need to be prepared to bear.

Every saving and investment product has different risks and returns. Differences include how readily investors can get their money when they need it, how fast their money will grow, and how safe their money will be. The primary risks faced by investors include:

Business Risk

With a stock, you are purchasing a piece of ownership in a company. With a bond, you are loaning money to a company. Returns from both of these investments require that the company stays in business. If a company goes bankrupt and its assets are liquidated, common stockholders are the last in line to share in the proceeds. If there are assets, the company's bondholders will be paid first, then holders of preferred stock. If you are a common stockholder, you get whatever is left, which may be nothing.

The business risk in purchasing an annuity is that the financial strength of the insurance company issuing the annuity may decline and not be able to pay out the annuity obligation.

Volatility Risk

Even when companies aren't in danger of failing, their stock price may fluctuate up or down. Large company stocks as a group, for example, have lost money on average about one out of every three years. A stock's price can be affected by factors inside the company, such as a faulty product, or by events the company has no control over, such as political or market events.

Inflation Risk

Inflation is a general upward movement of prices. Inflation reduces purchasing power, which is a risk for investors receiving a fixed rate of interest. The principal concern for individuals investing in cash equivalents is that inflation will erode returns.

Interest Rate Risk

Interest rate changes can affect a bond's value. If bonds are held to maturity the investor will receive the face value, plus interest. If sold before maturity, the bond may be worth more or less than the face value. Rising interest rates will make newly issued bonds more appealing to investors because the newer bonds will have a higher rate of interest than older ones. To sell an older bond with a lower interest rate, you might have to sell it at a discount.

Liquidity Risk

This refers to the risk that investors won't find a market for their securities, potentially preventing them from buying or selling when they want. This can be the case with the more complicated investment products. It may also be the case with products that charge a penalty for early withdrawal or liquidation such as a certificate of deposit (CD).

The Advisor does not primarily recommend a specific type of security. However, clients are advised that many unexpected broad environmental factors can negatively impact the value of portfolio securities causing the loss of some or all of the investment, including changes in interest rates, political events, natural disasters, and acts of war or terrorism. Further, factors relevant to specific securities may have negative effects on their value, such as competition or government regulation. Also, the factors for which the company was selected for inclusion in a client portfolio may change, for example, due to changes in management, new product introductions, or lawsuits.

Item 9 Disciplinary Information

Neither Longevity Capital Management nor its management persons have had any legal or disciplinary events, currently or in the past.

Item 10 Other Financial Industry Activities and Affiliations

Neither Longevity Capital Management nor any of its management persons are registered, or have an application pending to register, as a broker-dealer or a registered representative of a broker-dealer.

Neither Longevity Capital Management nor any of its management persons are registered or have an application pending to register, as a futures commission merchant, commodity pool operator, a commodity trading advisor, or an associated person of the foregoing entities.

Longevity Capital Management does not currently have any relationships or arrangements that are material to its advisory business or clients with either a broker-dealer, municipal securities dealer, or government securities dealer or broker, investment company or other pooled investment vehicle (including a mutual fund, closed-end investment company, unit investment trust, private investment company or “hedge fund” and offshore fund), other investment advisor or financial planner, futures commission merchant, commodity pool operator, or commodity trading advisor, banking or thrift institution, accountant or accounting firm, lawyer or law firm, pension consultant, real estate broker or dealer or sponsor of syndicator of limited partnerships.

Terri McGray, President, is licensed and registered as an insurance agent to sell life, accident, and other lines of insurance for various insurance companies. Therefore, she will be able to purchase insurance products for any client in need of such services and will receive separate, yet typical compensation in the form of commissions for the purchase of insurance products. This creates a conflict of interest because Ms. McGray may be incentivized to make recommendations based upon the compensation received rather than upon the client’s best interests. Clients are not obligated to use Ms. McGray for insurance products services. However, in such instances, there is no advisory fee associated with these insurance products, and clients will be made aware of all commissions associated with the products prior to the transactions.

Longevity Capital Management does not recommend or select other investment advisors for clients.

Item 11 Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

Longevity Capital Management is registering with the SEC and maintains a Code of Ethics pursuant to SEC rule 204A-1. Longevity Capital Management has adopted a Code of Ethics that sets forth the basic policies of ethical conduct for all managers, officers, and employees of the Advisor. In addition, the Code of Ethics governs personal trading by each employee of Longevity Capital Management deemed to be an Access Person and is intended to ensure that securities transactions effected by Access Persons of Longevity Capital Management are conducted in a manner that avoids any conflict of interest between such persons and clients of the Advisor or its affiliates. Longevity Capital Management collects and maintains records of securities holdings and securities transactions effected by Access Persons. These records are reviewed to identify and resolve conflicts of interest. Longevity Capital Management will provide a copy of the Code of Ethics to any client or prospective client upon request.

Longevity Capital Management does not recommend to clients, or buy or sell for client accounts, securities in which the firm or a related person has a material financial interest.

Longevity Capital Management and/or its investment advisor representatives may from time to time purchase or sell products that they may recommend to clients. This practice creates conflicts of interest in that personnel of Longevity Capital Management can take advantage of the advance knowledge of firm securities trading and trade their personal accounts ahead of the client trades or recommend trades in client accounts that may affect the price of the securities owned by the Investment Advisor Representatives. To mitigate these conflicts, Longevity Capital Management has adopted a Code of Ethics as noted above. Longevity Capital Management's Code of Ethics is available upon request. Finally, supervised persons of registered investment advisors are fiduciaries by law and are required to put the client's interest before those of the firm and themselves.

Longevity Capital Management requires that its investment advisor representatives follow its basic policies and ethical standards as set forth in its Code of Ethics.

Investment advisor representatives of Longevity Capital Management may trade for their own accounts securities that are being traded for client accounts at or about the same time. To mitigate the conflict of interest in such circumstances, Longevity Capital Management's policy is to require the trading of all relevant client accounts prior to the trading of their own accounts. The Chief Compliance Officer examines personal trading activities of Longevity Capital Management's personnel to verify compliance with this policy.

Item 12 Brokerage Practices

If requested by the client, Longevity Capital Management may suggest brokers or dealers to be used based on execution and custodial services offered, cost, quality of service and industry reputation. Longevity Capital Management will consider factors such as commission price, speed and quality of execution, client management tools, and convenience of access for both the Advisor

and client in making its suggestion. Longevity Capital Management requires that our clients use Charles Schwab & Co., Inc., a registered broker-dealer, member SIPC, as the qualified custodian.

The custodian and brokers we use

Longevity Capital Management does not maintain custody of your assets, although we are deemed to have custody of your assets if you give us authority to withdraw assets from your account (see Item 15 – Custody, below). Your assets must be maintained in an account at a “qualified custodian,” generally a broker-dealer or bank. We require that our clients use Charles Schwab & Co., Inc. (“Schwab”), a registered broker-dealer, member SIPC, as the qualified custodian. We are independently owned and operated and are not affiliated with Schwab. Schwab will hold your assets in a brokerage account and buy and sell securities when we instruct them to. We require that you use Schwab as custodian/broker and will open your account with Schwab by entering into an account agreement directly with them. We do not open the account for you, but we assist you in doing so. Not all advisors require their clients to use a particular broker-dealer or other custodian selected by the advisor. Even though your account is maintained at Schwab, we have the option to use other brokers to execute trades for your account as described below (see “Your brokerage and custody costs”).

How we select brokers/custodians

We seek to recommend a custodian/broker that will hold your assets and execute transactions on terms that are overall most advantageous when compared with other available providers and their services. We consider a wide range of factors, including:

- Combination of transaction execution services and asset custody services (generally without a separate fee for custody)
- Capability to execute, clear, and settle trades (buy and sell securities for your account)
- Capability to facilitate transfers and payments to and from accounts (wire transfers, check requests, bill payment, etc.)
- Breadth of available investment products (stocks, bonds, mutual funds, exchange-traded funds (ETFs), etc.)
- Availability of investment research and tools that assist us in making investment decisions
- Quality of services
- Competitiveness of the price of those services (commission rates, margin interest rates, other fees, etc.) and willingness to negotiate the prices
- Reputation, financial strength, security and stability
- Prior service to us and our clients
- Availability of other products and services that benefit us, as discussed below (see “Products and services available to us from Schwab”)

Your brokerage and custody costs

For our clients’ accounts that Schwab maintains, Schwab generally does not separately charge for custody services but is compensated by charging commissions or other fees on certain securities transactions that it executes or that settle into your Schwab account. Certain securities transactions (for example, many mutual funds, ETFs, and online stock and options trades) may not incur Schwab commissions or transaction fees. Schwab is also compensated by earning interest on the

uninvested cash in your account in Schwab's Cash Features Program. For some accounts, Schwab may charge a percentage of the dollar amount of assets in the account in lieu of commissions. In addition to commissions and asset-based fees, Schwab charges a flat dollar amount as a "prime broker" or "trade away" fee for each trade that we have executed by a different broker-dealer but where the securities bought or the funds from the securities sold are deposited (settled) into your Schwab account. These fees are in addition to the commissions or other compensation paid to the executing broker/dealer. Because of this, in order to minimize trading costs, we have Schwab execute most trades for your account. We have determined that having Schwab execute most trades is consistent with our duty to seek "best execution" of your trades. Best execution means the most favorable terms for a transaction based on all relevant factors, including those listed above (see "How we select brokers/custodians"). See Item 5 for a discussion on Longevity Capital Management's wrap fee program for Private Client Investment Management Service clients. Plan Sponsor clients will be responsible for all custodial and securities execution fees charged by Schwab.

Products and services available to us from Schwab

Schwab Advisor Services™ is Schwab's business serving independent investment advisory firms like us. They provide our clients and us with access to their institutional brokerage services (trading, custody, reporting and related services), many of which are not typically available to Schwab retail customers. Schwab also makes available various support services. Some of those services help us manage or administer our clients' accounts, while others help us manage and grow our business. Schwab's support services are generally available on an unsolicited basis (we don't have to request them) and at no charge to us. Following is a more detailed description of Schwab's support services:

Services that benefit you

Schwab's institutional brokerage services include access to a broad range of investment products, execution of securities transactions, and custody of client assets. The investment products available through Schwab include some to which we might not otherwise have access or that would require a significantly higher minimum initial investment by our clients. Schwab's services described in this paragraph generally benefit you and your account.

Services that may not directly benefit you

Schwab also makes available to us other products and services that benefit us but may not directly benefit you or your account. These products and services assist us in managing and administering our clients' accounts. They include investment research, both Schwab's own and that of third parties. We may use this research to service all or a substantial number of our clients' accounts, including accounts not maintained at Schwab. In addition to investment research, Schwab also makes available software and other technology that:

- provide access to client account data (such as duplicate trade confirmations and account statements)
- facilitate trade execution and allocate aggregated trade orders for multiple client accounts
- provide pricing and other market data
- facilitate payment of our fees from our clients' accounts

- assist with back-office functions, recordkeeping, and client reporting

Services that generally benefit only us

Schwab also offers other services intended to help us manage and further develop our business enterprise. These services include:

- Educational conferences and events
- Consulting on technology, compliance, legal, and business needs
- Publications and conferences on practice management and business succession
- Access to employee benefits providers, human capital consultants, and insurance providers
- Marketing consulting and support

Schwab may provide some of these services itself. In other cases, it will arrange for third-party vendors to provide the services to us. Schwab may also discount or waive its fees for some of these services or pay all or a part of a third party's fees. Schwab may also provide us with other benefits such as occasional business entertainment of our personnel.

Our interest in Schwab's services

The availability of these services from Schwab benefits us because we do not have to produce or purchase them. We don't have to pay for Schwab's services. These services are not contingent upon us committing any specific amount of business to Schwab in trading commissions or assets in custody. This creates an incentive to recommend that you maintain your account with Schwab, based on our interest in receiving Schwab's services that benefit our business and Schwab's payment for services for which we would otherwise have to pay rather than based on your interest in receiving the best value in custody services and the most favorable execution of your transactions. This is a potential conflict of interest. We believe, however, that our selection of Schwab as custodian and broker is in the best interests of our clients. Our selection is primarily supported by the scope, quality, and price of Schwab's services (see "How we select brokers/custodians") and not Schwab's services that benefit only us.

For any such products and services Longevity Capital Management receives from Schwab or other custodians, it will follow procedures which ensure compliance with Section 28(e) of the Securities Exchange Act of 1934 or applicable state securities rules.

Longevity Capital Management does not receive client referrals from any broker-dealer or third party as a result of the firm selecting or recommending that broker-dealer to clients.

Longevity Capital Management recommends that all clients use a particular broker-dealer for execution and/or custodial services. The broker-dealer is recommended based on criteria such as, but not limited to, reasonableness of commissions charged to the client, tools and services made available to the client and the Advisor, and convenience of access to the account trading and reporting. The client will provide authority to Longevity Capital Management to direct all transactions through that broker-dealer in the investment advisory agreement.

As an investment advisory firm, Longevity Capital Management has a fiduciary duty to seek best execution for client transactions. While best execution is difficult to define and challenging to measure, there is some consensus that it does not solely mean the achievement of the best price on a given transaction. Rather, it appears to be a collective consideration of factors concerning the trade in question. Such factors include the security being traded, the price of the trade, the speed of the execution, apparent conditions in the market, and the specific needs of the client. Longevity Capital Management's primary objectives when placing orders for the purchase and sale of securities for client accounts is to obtain the most favorable net results taking into account such factors as 1) price, 2) size of order, 3) difficulty of execution, 4) confidentiality and 5) skill required of the broker. Longevity Capital Management may not necessarily pay the lowest commission or commission equivalent as specific transactions may involve specialized services on the part of the broker.

Longevity Capital Management does not permit clients to direct brokerage.

Longevity Capital Management may combine orders into block trades when more than one account is participating in the trade. This blocking or bunching technique must be equitable and potentially advantageous for each such account (e.g. for the purposes of reducing brokerage commissions or obtaining a more favorable execution price). Block trading is performed when it is consistent with the duty to seek best execution and is consistent with the terms of Longevity Capital Management's investment advisory agreements. Equity trades are blocked based upon fairness to client, both in the participation of their account, and in the allocation of orders for the accounts of more than one client. Allocations of all orders are performed in a timely and efficient manner. All managed accounts participating in a block execution receive the same execution price (average share price) for the securities purchased or sold in a trading day. Any portion of an order that remains unfilled at the end of a given day will be rewritten on the following day as a new order with a new daily average price to be determined at the end of the following day. Due to the low liquidity of certain securities, broker availability may be limited. Open orders are worked until they are completely filled, which may span the course of several days. If an order is filled in its entirety, securities purchased in the aggregated transaction will be allocated among the accounts participating in the trade in accordance with the allocation statement. If an order is partially filled, the securities will be allocated pro rata based on the allocation statement. Longevity Capital Management may allocate trades in a different manner than indicated on the allocation statement (non-pro rata) only if all managed accounts receive fair and equitable treatment.

Item 13 Review of Accounts

The firm reviews client accounts on a continuous and ongoing basis, but no less frequently than annually or when conditions would warrant a review based on market conditions or changes in client circumstances. Triggering factors may include Longevity Capital Management becoming aware of a change in client's investment objective, a change in market conditions, change of employment, or a change in recommended asset allocation weightings in the account that exceed a predefined guideline. The nature of the review is to determine if the client account is still in line with the client's stated objectives. Comprehensive financial plans are reviewed on a continuous and ongoing basis, but no less frequently than annually with the client. Standalone financial plans, once prepared and delivered to the client are not reviewed again unless the client requests a

financial plan be updated. Client accounts and financial plans are reviewed by Terri McGray, President.

The client is encouraged to notify the Advisor and investment advisor representative if changes occur in his/her personal financial situation that might materially affect his/her investment plan.

The client will receive written statements no less than quarterly from the custodian. In addition, the client will receive other supporting reports from mutual funds, asset managers, trust companies or other custodians, insurance companies, broker-dealers, and others who are involved with client accounts. Annually, Longevity Capital Management prepares and delivers separate performance reports to clients. Clients are urged to compare the account statements they receive from the qualified custodian with the reports they receive from Longevity Capital Management. Any discrepancies should be immediately brought to the firm's attention.

Item 14 Client Referrals and Other Compensation

Longevity Capital Management is not compensated by anyone for providing investment advice or other advisory services except as previously disclosed in this Brochure.

Longevity Capital Management does not directly or indirectly compensate any person who is not a supervised person for client referrals.

Item 15 Custody

Longevity Capital Management does not have custody of client funds or securities, except for the withdrawal of advisory fees directly from client accounts (please see Item 5 which describes the safeguards around direct fee deduction). However, as noted in Item 13 above, clients will receive statements not less than quarterly from the qualified custodian, and we encourage you to review those statements carefully. Any discrepancies should be immediately brought to the firm's attention.

Item 16 Investment Discretion

Longevity Capital Management generally has discretion over the selection and amount of securities to be bought or sold in client accounts without obtaining prior consent or approval from the client for each transaction. However, these purchases or sales may be subject to specified investment objectives, guidelines, or limitations previously set forth by the client and agreed to by Longevity Capital Management.

Discretionary authority will only be provided upon full disclosure to the client. The granting of such authority will be evidenced by the client's execution of an Investment Advisory Agreement containing all applicable limitations to such authority. All discretionary trades made by Longevity Capital Management will be in accordance with each client's investment objectives and goals.

Item 17 Voting Client Securities

Longevity Capital Management will not vote, nor advise clients how to vote, proxies for securities held in client accounts. The client clearly keeps the authority and responsibility for the voting of these proxies. Also, Longevity Capital Management cannot give any advice or take any action with respect to the voting of these proxies. The client and Longevity Capital Management agree to this by contract. Clients will receive proxy solicitations from their custodian and/or transfer agent.

Item 18 Financial Information

Longevity Capital Management does not require or solicit prepayment of more than \$1,200 in fees per client, six months or more in advance, and is not required to file a balance sheet.

Longevity Capital Management has discretionary authority over client accounts and is not aware of any financial condition that will likely impair its ability to meet contractual commitments to clients. If Longevity Capital Management does become aware of any such financial condition, this Brochure will be updated and clients will be notified.

Longevity Capital Management has never been subject to a bankruptcy petition.